Document Log Item

Addressing	
From	**To**
Sara Greiner/R9/USEPA/US	"Steven Costa" <glatzeldacosta@suddenlink.net>
CC	**BCC**
Carl Goldstein/R9/USEPA/US@EPA pjp617@uow.edu.au	Sara Greiner/R9/USEPA/US

Description			Form Used: Reply
Subject		**Date/Time**	
Re: Assessment of nutrients from cannery discharges		11/14/2007 08:42 AM	
# of Attachments	**Total Bytes**	**NPM**	**Contributor**
1	8,888,827		Marcela VonVacano

Processing
Comments

Body

Document Body

The workplan for chronic toxicity is to show how the canneries will be doing the rangefinding tests and how they will go about determining at which effluent concentration they see no toxicity. right now the canneries will show chronic toxicity at 100 percent effluent. thus, they will need a mixing zone for chronic toxicity with the appropriate dilution factor. American Samoa water quality standards say if mixing zone is granted chronic toxicity standards must comply at the boundary of the ZID or in this case at the 313:1 dilution. EPA guidance says that the mixing zone should be a small as possible. at this time, epa will not approve a mixing zone of 313:1 for chronic toxicity. rather, the canneries must test to see what is the minimal they would need to meet the water quality standard. There are several facilities in California that have done this same thing and the labs are well familiar with this approach. EPA's Richmond lab will be reviewing the workplan.

a TRE/TIE is when the canneries begin their regular chronic toxicity monitoring - after they determine there in-stream waste concentration and test concentrations - and find toxicity - what they are going to do then.

Attached is EPA Region 9/10's guidance for WET (Sept 2007 update) for more information.


Tox Training Tool.pdf

Sara N. Greiner
U.S. Environmental Protection Agency
Clean Water Act Standards and Permits Office
75 Hawthorne Street, WTR-5
San Francisco, California 94105
Telephone: 415-972-3042
Fax: 415-947-3545

"Steven Costa" <glatzeldacosta@suddenlink.net>

"Steven Costa"
<glatzeldacosta@suddenlink.net>

ToSara Greiner/R9/USEPA/US@EPA
cc
SubjectRe: Assessment of nutrients from cannery discharges

11/14/2007 07:35 AM

Please respond to
"Steven Costa"
<glatzeldacosta@suddenlink.net>

Sara,

I believe I assumed they were one and the same - or were so closely related
that they would be combined or at least parallel. What is your thinking on

what each covers and I will factor that into the permit compliance work plan
I am doing for the canneries.

If it is faster to just call, I will be in the office today at 707-677-0123.

Steve

----- Original Message -----
From: <Greiner.Sara@epamail.epa.gov>
To: "Steven Costa" <glatzeldacosta@suddenlink.net>
Sent: Tuesday, November 13, 2007 4:51 PM
Subject: Re: Assessment of nutrients from cannery discharges

>
> Steve - I cannot believe it - I forgot to include the workplan for the
> special chronic toxicity study. This is different than the workplan for
> the TRE/TIE. The workplan for the chronic toxicity study will be due
> within 6 months of the effective date of the permit.
>
> sng
>
> _____
> Sara N. Greiner
> U.S. Environmental Protection Agency
> Clean Water Act Standards and Permits Office
> 75 Hawthorne Street, WTR-5
> San Francisco, California 94105
> Telephone: 415-972-3042
> Fax: 415-947-3545
> _____
>
>
>

>
> "Steven Costa"
> <glatzeldacosta@
> suddenlink.net> To
> Sara Greiner/R9/USEPA/US@EPA
> 11/08/2007 05:07 cc
> PM
> Subject
> Re: Assessment of nutrients from
> Please respond cannery discharges
> to
> "Steven Costa"
> <glatzeldacosta@
> suddenlink.net>
>
>
>
>
>
>
> Sara,
>
> Seems clear to me.
>
> On a related subject can you provide (a rough idea) of the schedule
of
> one-time deliverables as you see them. The canneries have asked that
I
> prepare next years budget and have asked that I include estimates
for
> most
> of the requirements. In particular, can you fill in or confirm the
> following relative to EDP:
>
> Nutrient evaluation
> Work Plan (1 year)
> Report (??)
> QC Plan for Lab

> Plan complete (90 days)
> Cu, Zn, Hg source assessment
> Work Plan (?)
> Report (1 year)
> TIE/TRE
> Work Plan(?)
> Complete (4 yrs)
> Pollution Prevention Plan
> Plan update (90 days?)
> Anything else that will be due other than monitoring reports?
>
> Can we assume the first monitoring episode next year will be done under
> the
> new permit conditions?
>
> Thanks,
>
> Steve
>
> ----- Original Message -----
> From: <Greiner.Sara@epamail.epa.gov>
> To: "Steven Costa" <glatzeldacosta@suddenlink.net>;
> <Goldstein.Carl@epa.gov>; "Edna Buchan" <ebuchan2@yahoo.com>; "Peter
> Peshut"
> <pjp617@uow.edu.au>; "Karen Glatzel" <kargatgdc@suddenlink.net>
> Sent: Thursday, November 08, 2007 2:55 PM
> Subject: Assessment of nutrients from cannery discharges
>
>
>>
>> Hi all,
>>
>> As discussed previously, I have included a permit requirement for the
>> canneries to conduct an assessment of nutrient loading. Here is what
> is

>> in the fact sheet. Please let me know if you have any questions.
The
>> permits language will not deviate much more than this.
>>
>> Steve, is it clear from this what is expected of the canneries?
>>
>> sng
>>
>>
> ++
++++++++++++++++++++++++++++++++
>
>>
>> D. Assessment of nutrient loading and assimilative capacity in Pago
>> Pago Harbor
>>
>> No dilution factors are currently available to accurately assess
>> the size of the mixing zone for nutrients and establish water
>> quality-based effluent limitations based on statistical procedures
>> outline in EPA's TSD in the draft permit. The proposed effluent
>> limitations for total nitrogen and total phosphorus are re-
established
>> in the draft permit from existing permit limitations based on
>> information derived from several mass-based models and subsequent
dye
>> studies conducted in the early 1990s. These models determined that
a
>> mixing zone boundary set at 1,300 feet from the diffuser, or the
> 30-foot
>> depth contour, whichever is closer, would be able to assimilate
60,000
>> lbs/month of total nitrogen and 12,000 lbs/month of total
phosphorus
>> from the canneries discharges. For total nitrogen, assuming a 30-
day
>> month, approximately 2,000 lbs/day could be discharged between the
two

>> canneries, with the discharge still meeting water quality
standards.
>> For total phosphorus, approximately 400 lbs/day could be
discharged.
>> Consequently, the StarKist Samoa Inc. and COS Samoa Packing
Company,
>> Inc. agreed to portion the total mass between them, for which
permit
>> effluent limitations were established.
>>
>> Although nutrients discharged from the combined cannery outfall
>> may not be significantly impacting water quality in Pago Pago
Harbor
>> based on receiving water monitoring data, EPA believes that it is
>> important to re-assess nutrient loading from the canneries due to
the
>> availability of new effluent and water quality data, and advanced
>> modeling applications that have been developed since 1991. The
draft
>> permit requires the permittee, in coordination with COS Samoa
Packing
>> Company, Inc., to conduct an assessment of nutrient loading and the
>> existing mixing zone for nutrients. The draft permit requires the
>> permittee, in coordination with COS Samoa Packing Company, Inc., to
>> submit a brief workplan (no more than five pages) that describes
the
>> techniques and procedures it will use to assess nutrient loading in
> the
>> receiving water. The draft permit requires that permittee to submit
> the
>> workplan no later than one year after the effective date of the
> permit.
>> _____
>> Sara N. Greiner
>> U.S. Environmental Protection Agency
>> Clean Water Act Standards and Permits Office
>> 75 Hawthorne Street, WTR-5
>> San Francisco, California 94105

>> Telephone: 415-972-3042
>> Fax: 415-947-3545
>> _____
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